

STATE OF SOUTH CAROLINA)

(Caption of Case))

Application of Palmetto Utilities, Incorporated for
Adjustment (Increase) of Rates and Charges,
Terms and Conditions, for Sewer Service
Provided to Customers in Its Richland and
Kershaw County Service Areas)BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET/NDI

NUMBER: 2019 - 281 - S

(Please type or print)

Submitted by: John Hoefer

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input checked="" type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

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MAR 20 2020

PSC SC
MAIL / DMS

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ATTORNEYS & COUNSELORS AT LAW

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POSTED
3-20-2020

March 19, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

RE: Application of Palmetto Utilities, Inc. for adjustment of rates and charges for, and the modification of certain terms and conditions related to, the provision of sewer service.; Docket No. 2019-281-S

Dear Ms. Boyd:

Enclosed for filing on behalf of Palmetto Utilities, Inc. is a Motion for Stay of All Proceedings in the above-referenced matter. By copy of this letter, I am serving a copy of this document upon the parties of record to this proceeding and enclose a Certificate of Service to that effect.

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ACCEPTED FOR PROCESSING - 2020 March 20 10:58 AM - SCPSC - 2020-106-A - Page 2 of 7
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If you have any questions, please do not hesitate to contact me.

Sincerely,

WILLOUGHBY & HOEFER, P.A.

s/John M. S. Hoefer

John M. S. Hoefer

JMSH/cgc
Attachments

cc: Christopher Huber, Esquire
Jeffrey M. Nelson, Esquire
Jenny R. Pittman, Esquire
Carri Grube-Lybarker, Esquire
L. Becky Dover, Esquire
Roger P. Hall, Esquire
Ms. Lisa Levine

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2019-281-S

IN RE:)	
)	
Application of Palmetto Utilities, Inc.)	
for adjustment of rates and)	
charges for, and the modification of)	MOTION FOR STAY OF ALL
certain terms and conditions related to,)	PROCEEDINGS
the provision of sewer service.)	
_____)	

Pursuant to 10 S.C. Code Regs. 103-838 (2012), Applicant Palmetto Utilities, Inc. (“PUI”) submits this Motion for a Stay of All Proceedings in the above-captioned docket for a period of sixty (60) days. In support of this motion, PUI would respectfully show unto this Commission as follows:

1. At the request of the Commission made in Order No. 2020-240 issued March 18, 2020, PUI has on this date waived and voluntarily stayed the deadlines set forth in S.C. Code Ann. §58-5-240.

2. In view of PUI’s waiver and voluntary stay, and the present State of Emergency which has been declared by the Governor of South Carolina as a result of the COVID-19 crisis, PUI submits that it is appropriate that all proceedings in this matter, including the holding of scheduled public hearings, the pre-filing of testimony, the exchange of discovery, the submission of motions, and other proceedings be stayed to allow PUI’s customers, the parties and their employees to focus on their collective interests in addressing the emergency and crisis.

4. The South Carolina Office of Regulatory Staff (“ORS”), the Consumer Advocate, and Intervenor Lisa Levine do not object to a stay.

5. The granting of this motion and the proposed stay will also provide the parties of record an opportunity to discuss the potential for a settlement of the issues between them.

6. PUI submits that the foregoing constitutes good cause for this request and therefore moves that the Commission stay all proceedings in this matter for a period of 60 days.

Respectfully submitted,

/s/ John M. S. Hoefer

John M. S. Hoefer

Andrew R. Hand

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Attorneys for Palmetto Utilities, Inc.

March 19, 2020

Columbia, South Carolina

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-281-S

In Re:)
)
Application of Palmetto Utilities, Inc.)
for adjustment of rates and charges for,)
and the modification of certain terms)
and conditions related to, the provision)
of sewer service.)
)
_____)

CERTIFICATE OF SERVICE

This is to certify that I, a Legal Assistant with the law firm Willoughby & Hoefer, P.A., have caused to be served this day one (1) copy of a **Motion for Stay of All Proceedings** in the above-captioned matter to the individuals listed below by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

Christopher Huber, Esquire
Jeffrey M. Nelson, Esquire
Jenny R. Pittman, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

Carri Grube-Lybarker, Esquire
L. Becky Dover, Esquire
Roger P. Hall, Esquire
SC Department of Consumer Affairs
PO Box 5757
Columbia, SC 29250-5757

Ms. Lisa Levine
2 Runneymede Court
Blythewood, SC 29016


Cathy G. Caldwell

Columbia, South Carolina
This 19th day of March, 2020.